June 12, 2008

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Petition for Rulemaking to Establish Rules Governing Network Management Practices by Broadband Network Operators, Petition for Declaratory Ruling Regarding Internet Management Policies, Broadband Industry Practices, WC Docket No. 07-52

Dear Ms. Dortch:

On June 11, 2008, Douglas Pasko, Co-Chair of the P4P Working Group (P4PWG), and I met with Amy E. Bender, Legal Advisor to Chairman Kevin Martin, to discuss the industry efforts currently underway to develop business practices and technological processes that could both improve the speed and efficiency of peer-to-peer (P2P) file transfers while also reducing the strain placed on broadband networks by P2P applications. Specifically, we described how the protocols that are being developed within the P4PWG may guide the selection of file sources and network pathways in a manner that maximizes network efficiency and increases the speeds by which customers using P2P systems may redistribute files. Our discussion was consistent with the attached handout.

Respectfully submitted,

Martin C. Lafferty

Martin C. Lafferty
Chief Executive Officer
Distributed Computing Industry Association

Attachment
CC: Amy E. Bender

Distributed Computing Industry Association (DCIA)
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P4P Working Group

Doug Pasko, Co-Chair, Verizon
Laird Popkin, Co-Chair, Pando

A Distributed Computing Industry Association (DCIA) led initiative.

P4P Mission Statement

To work jointly and cooperatively with leading **Internet service providers** (ISPs), **peer-to-peer** (P2P) software distributors, and technology **researchers** to ascertain appropriate and voluntary **best practices** to **accelerate** distribution of content and **optimize** utilization of ISP network resources in order to provide the best possible performance to end-user customers

60+ P4P WG Members

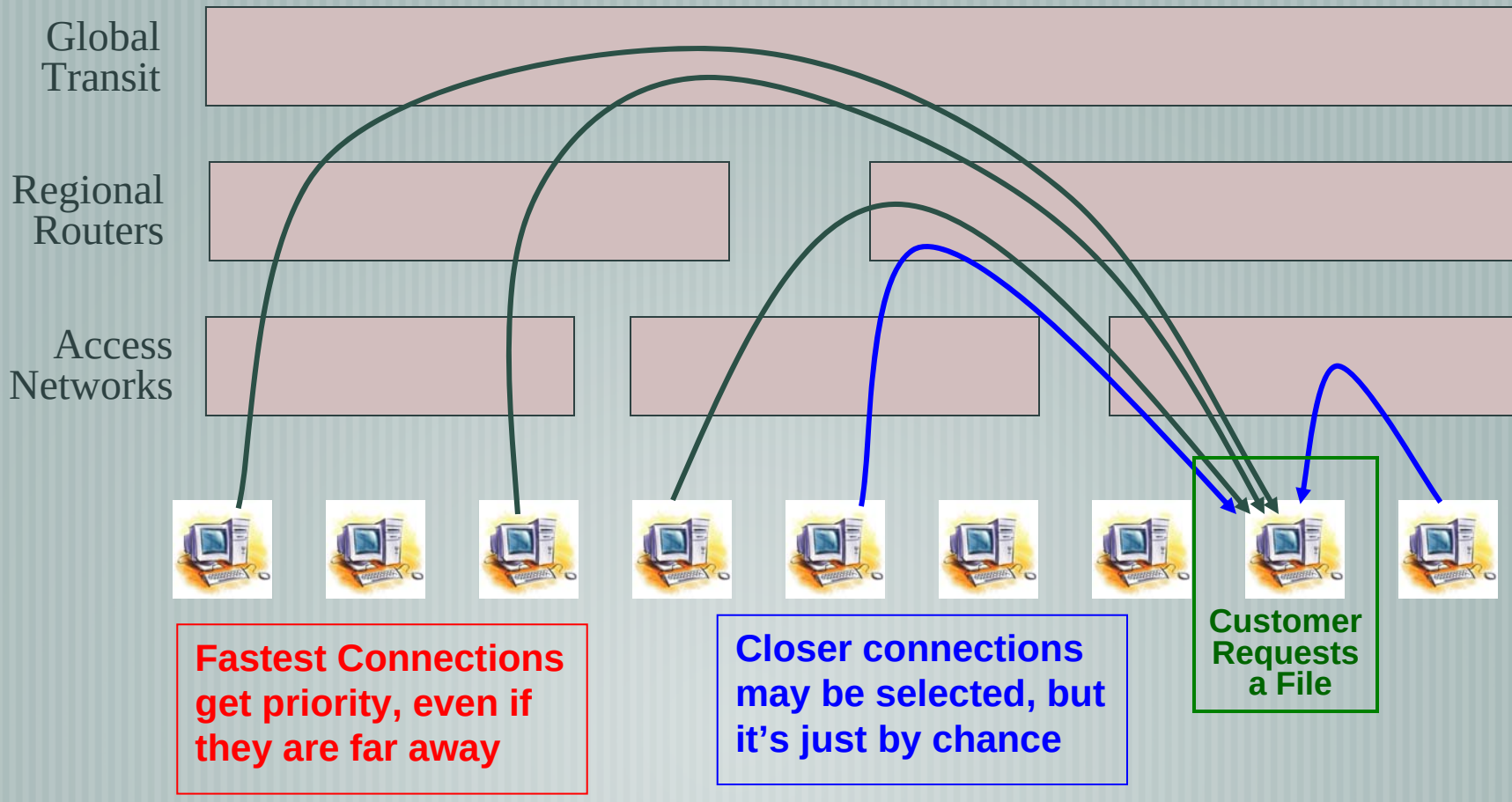
Core Group	AT&T Bell Labs Bezeq Intl BitTorrent Cisco Systems Comcast Grid Networks Joost	KlikVU Kontiki LimeWire Manatt Oversi Pando Networks PeerApp Solid State	Telefonica Group Velocix VeriSign Verizon Vuze University of Toronto Univ of Washington Yale University
Observers	Abacast AHT Intl AjauntySlant Akamai Alcatel Lucent Allsii Andolis CableLabs Cablevision CloudShield Conviva Cox Comm	DigiMeld Exa Networks Itiva Technologies Huwaei Juniper Networks Lariat Network Level 3 Communications Limelight Networks Microsoft MPAA NBC Universal Nokia	Orange Princeton University Qwest RawFlow RSUC/GweepNet SaskTel Solana Networks Speakeasy Network Stanford University Thomson Time Warner Cable Turner Broadcasting UCLA

P4P Sub Committees

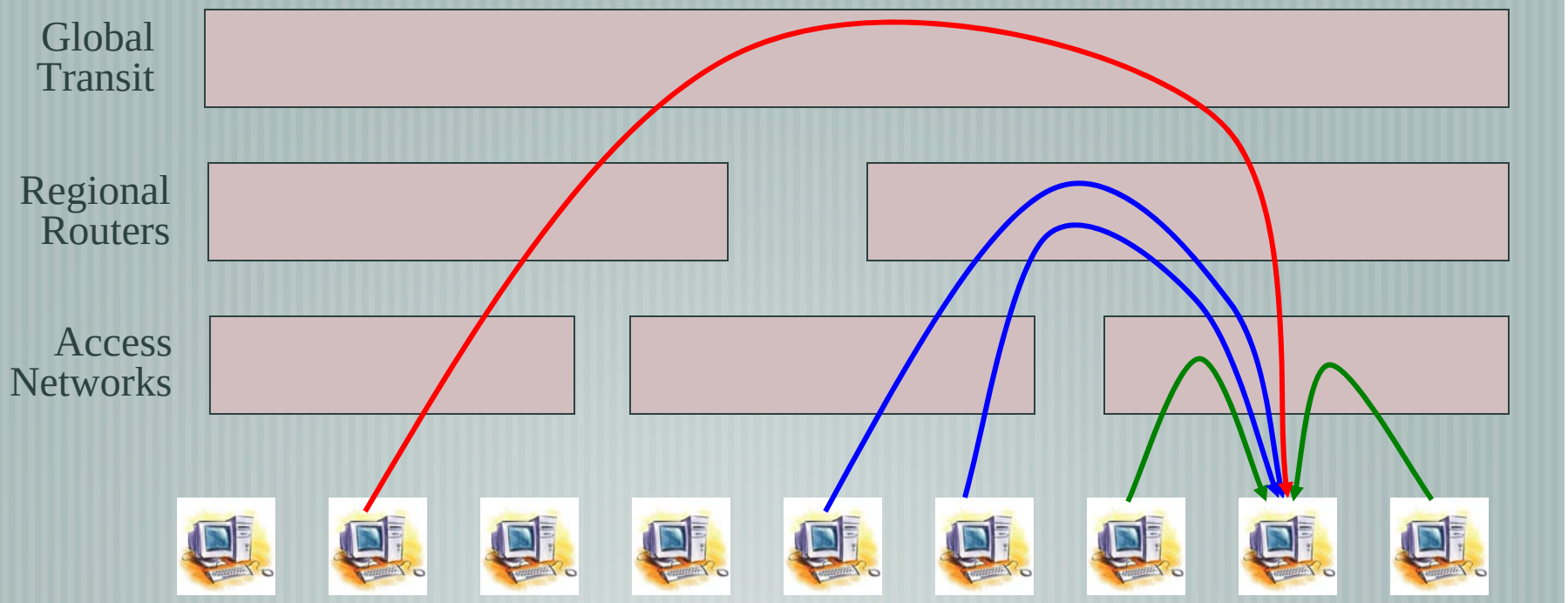
- Caching – Eliot Listman (PeerApp)
- Live P2P – Mike King (Abacast)
- Telco – Jia Wang (AT&T)
- Cable – Rich Woundy (Comcast)
- Wireless/Mobile – Tim Cricchio (Cisco)
- Satellite – Lowell Feuer (Klikvu)
- Hardware – Jeffrey Payne (GridNetworks)
- Standards – Enrico Marocco (Telecom Italia)
- Research – Richard Yang (Yale)
- IP Policy / Guidelines – See-Mong Tan (Microsoft)

P2P Sources Are Selected Based On Connectivity Speed

(Network Efficiency is not considered)



P4P Considers The Network



P4P Test Methodology

- Simulations performed by Yale on data from AT&T, Telefonica, Verizon
- Real World Field Test by Telefonica, Verizon, Yale and Pando.

P4P Test Results

- **P2P traffic traveled shorter distances which:**
  - Reduces traffic load on national backbone links
  - Reduces traffic load on regional backbone links
  - Increases performance of P2P downloads

- **Some Field Trial Statistics:**
  - P2P traffic traversed fewer hops, dropping from an average of 5.5 to 0.89 (staying within metro considered 0 hops)
  - 57.98% of P2P traffic never left the metropolitan area of the requesting user, as compared to 6.27% without P4P optimization
  - Average user download speed increase for FiOS customers was 205% over normal P2P (a 2x improvement)

Upcoming Field Tests

- Multi-ISP Field Test in June
- Additional P2P Company Field Tests following shortly